

Jonathan R. Howden (Bar No. 97022)
Lynn R. Fiorentino (Bar No. 226691)
THELEN REID BROWN RAYSMAN & STEINER LLP
101 Second Street, Suite 1800
San Francisco, CA 94105
jhowden@thelen.com
Tel. 415.369.7157
Fax 415.369.8683

Attorneys for Material Witness
ZONG BIN LI

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

In Re Material Witness Warrant

Case No.: 07 90552 MISC VRW (JCS)

**DECLARATION OF ZONG BIN LI IN
SUPPORT OF EMERGENCY APPLICATION
FOR TRAVEL ORDER**

I, Zong Bin Li, declare as follows:

1. I am over the age of 18 and have personal knowledge of the following facts and, if called to testify, could and would competently testify thereto.
2. I was the Able Bodied Seaman (AB1) of the M/V Cosco Busan which collided with the San Francisco Oakland Bay Bridge on November 7, 2007. Since that time, I have been detained in the District as a material witness as part of the government's criminal investigation in this matter. At all times, I have fully cooperated with the government's investigation.

1 3. At this time, I am requesting the Court's permission to return to my homeland of
2 China, departing no later than September 2, 2008 for a period of three weeks, due to exigent
3 family circumstances. I am informed by my mother that my 88 year-old grandmother who resides
4 in HeNan province, PRC China is suffering from heart-related problems and her health is
5 deteriorating rapidly. I am deeply concerned that if I am not able to return home to China for a
6 brief period of time in the immediate future, I may not see my grandmother again.

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8 4. Since the date of the accident, I have established significant ties with the
9 community as set forth below.

10 5. For approximately the past two months, I have been employed as a kitchen helper
11 at a reputable Japanese restaurant in San Francisco where I work approximately 40 hours per
12 week. I also volunteer to work overtime when needed. I very much enjoy my job and plan to
13 continue working at the restaurant indefinitely.

14 6. I have a work permit and Social Security card.

15 7. I pay state and federal taxes from the earnings I make as set forth in paragraph five
16 above.

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18 8. If I am granted permission to temporarily return to China to visit my ailing
19 grandmother, I will stay with my family who resides in HeNan Province, PRC China. I have
20 provided to my attorney, Jonathan Howden, the address of my family's residence as well as the
21 following phone numbers so that I may be contacted at any time while in China: my family's
22 home telephone number, my cellular telephone number, my brother's cellular telephone number,
23 and my girlfriend's cellular telephone number.

24 9. I am prepared to post the equivalent of two months' of my current salary from my
25 position with the M/V Cosco Busan to the court to hold as bond for my promise to return to San
26 Francisco to continue cooperating with the government's investigation of this matter. I promise
27 to return to San Francisco by September 23, 2008.
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1 10. My employer supports my brief visit home to China and has promised to allow me
2 to resume working as a kitchen helper upon my return to San Francisco. I fully intend to return to
3 resume my job duties in San Francisco described in paragraph five following a brief visit to my
4 homeland of China as requested herein.

5 I declare under penalty of perjury of the laws of the State of California that the foregoing is
6 true and correct to the best of my information and belief. Executed this 21 day of August 2008,
7 at San Francisco, California.
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12 Zong Bin Li
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